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Attorneys for Wells Fargo Bank, N.A.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ARGO NEVADA, LLC, a Nevada limited
liability company,

Plaintiff,

vs.

QUALITY LOAN SERVICE
CORPORATION, a foreign corporation
doing business in Nevada; WELLS
FARGO BANK, NA; DOES 1-5, inclusive;
and ROE Business Entities 6-10, inclusive,

Defendants.

Case No. 2:16-cv-02212-RFB-VCF

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

Pursuant to Fed. R. Civ. P. 41(a)(2), it is hereby stipulated and agreed between Argo Nevada, LLC ("Plaintiff"), Wells Fargo Bank, N.A. ("Wells Fargo"), and Quality Loan Service Corporation ("Quality Loan") (collectively, the "Parties") by and through their respective counsel, that:

1. An order shall be entered dismissing this action, and each and all of the claims and causes of action asserted herein, with prejudice;
2. All outstanding hearings and deadlines shall be vacated;

3. The Parties shall bear their own attorneys' fees and costs associated with this action;
4. All lis pendens recorded by Plaintiff against the real property located at 6001 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and expunged of record;
5. Plaintiff is prohibited from recording any additional lis pendens or similar instruments against the Property; and
6. The bond shall be released to the Law Offices of Mont E. Tanner.

DATED this 13th day of December 2017.

DATED this ____ day of December 2017.

SNELL & WILMER L.L.P.

LAW OFFICES OF MONT E. TANNER

By: 

By: _____

Amy F. Sorenson (NV Bar No. 12495)
Robin E. Perkins (NV Bar No. 9891)
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Mont E. Tanner (NV Bar No. 4433)
2950 East Flamingo Road, Suite G
Las Vegas, NV 89121
Telephone: (702) 369-9614
Facsimile: (702) 369-5731

Attorney for Plaintiff Argo Nevada, LLC

*Attorneys for Defendant Wells Fargo Bank,
N.A.*

DATED this ____ day of December 2017.

MCCARTHY AND HOLTHUS

By: _____

Thomas N. Beckom (NV Bar No. 12554)
9510 West Sahara, Suite 200
Las Vegas, NV 89117
Telephone: (702) 685-0329
Facsimile: (702) 339-5691

*Attorneys for Defendant Quality Loan
Service Corporation*

- 1 3. The Parties shall bear their own attorneys' fees and costs associated with this
- 2 action;
- 3 4. All lis pendens recorded by Plaintiff against the real property located at 6001
- 4 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the
- 5 "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or
- 6 about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and
- 7 expunged of record;
- 8 5. Plaintiff is prohibited from recording any additional lis pendens or similar
- 9 instruments against the Property; and
- 10 6. The bond shall be released to the Law Offices of Mont E. Tanner.

11 DATED this ____ day of December 2017.

12 SNELL & WILMER L.L.P.

13 By: _____

14 Amy F. Sorenson (NV Bar No. 12495)

15 Robin E. Perkins (NV Bar No. 9891)

16 Jennifer L. McBee (NV Bar No. 9110)

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18 Las Vegas, NV 89169

19 Telephone: (702) 784-5200

20 Facsimile: (702) 784-5252

21 Attorneys for Defendant Wells Fargo Bank, N.A.

22 DATED this ____ day of December 2017.

23 MCCARTHY AND HOLTHUS

24 By: _____

25 Thomas N. Beckom (NV Bar No. 12554)

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27 Las Vegas, NV 89117

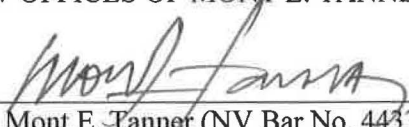
28 Telephone: (702) 685-0329

 Facsimile: (702) 339-5691

 Attorneys for Defendant Quality Loan Service Corporation

 DATED this 12 day of December 2017.

 LAW OFFICES OF MONT E. TANNER

 By:  _____

 Mont E. Tanner (NV Bar No. 4433)

 2950 East Flamingo Road, Suite G

 Las Vegas, NV 89121

 Telephone: (702) 369-9614

 Facsimile: (702) 369-5731

 Attorney for Plaintiff Argo Nevada, LLC

- 1 3. The Parties shall bear their own attorneys' fees and costs associated with this
- 2 action;
- 3 4. All lis pendens recorded by Plaintiff against the real property located at 6001
- 4 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the
- 5 "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or
- 6 about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and
- 7 expunged of record;
- 8 5. Plaintiff is prohibited from recording any additional lis pendens or similar
- 9 instruments against the Property; and
- 10 6. The bond shall be released to the Law Offices of Mont E. Tanner.

11 DATED this ____ day of December 2017.

DATED this ____ day of December 2017.

12 SNELL & WILMER L.L.P.

LAW OFFICES OF MONT E. TANNER

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Facsimile: (702) 369-5731

Attorney for Plaintiff Argo Nevada, LLC

18 *Attorneys for Defendant Wells Fargo Bank,*

19 *N.A.*

20 DATED this 12 day of December 2017.

21 MCCARTHY AND HOLTHUS

22 By:  _____

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25 *Attorneys for Defendant Quality Loan*

26 *Service Corporation*

ORDER

For good cause appearing,

IT IS HEREBY ORDERED that this action, and each and all of the claims and causes of action asserted herein, be DISMISSED WITH PREJUDICE, with each party to bear their own attorney's fees and costs;

IT IS FURTHER ORDERED that all hearings and deadlines be VACATED;

IT IS FURTHER ORDERED that all lis pendens recorded by Plaintiff against the real property located at 6001 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and expunged of record;

IT IS FURTHER ORDERED that Plaintiff is prohibited from recording any additional lis pendens or similar instruments against the Property; and

IT IS FURTHER ORDERED that the bond shall be released to the Law Offices of Mont E. Tanner.

IT IS SO ORDERED.

DATED this 16th day of January, 2018.



RICHARD F. BOULWARE, II
United States District Judge

Respectfully submitted,

SNELL & WILMER L.L.P.

By: 

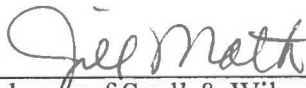
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Attorneys for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, I electronically filed the foregoing **STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 10th day of January 2018.


An Employee of Snell & Wilmer L.L.P.